



## **eMolecules, Inc. Supplier Code of Conduct**

eMolecules is driven to improve the human condition by enabling scientists to accelerate their research to find effective therapeutics. To enable this vision, we have partnered with a collection of world-class suppliers. The purpose of this Code of Conduct is to set-forth eMolecules' specific expectations for our suppliers, which are in line with our own, internal corporate values.

### ***Ethical Practices***

eMolecules Suppliers shall conduct their business in accordance with the highest ethical standards and require the same compliance throughout their entire supply chain.

eMolecules Suppliers shall demonstrate a zero-tolerance policy prohibiting any and all forms of corruption and bribery. All business dealings shall be transparently performed and accurately reflected within their records. eMolecules Suppliers shall choose their business partners carefully and only after conducting a thorough background check and due diligence.

eMolecules Suppliers' monitoring and enforcement procedures must be sufficient to ensure compliance with all applicable anti-bribery and anti-corruption legislation including the provisions of the German Criminal Code, the U.S. Foreign Corrupt Practices Act (FCPA) and the Bribery Act 2010 in the United Kingdom of Great Britain.

### **Do not give or receive bribes**

eMolecules Suppliers shall not offer, give, receive, or solicit any bribes or other means to obtain any improper benefit or advantage. eMolecules Suppliers shall not allow others to make improper payments for their benefit.

### **Disclose information truthfully**

eMolecules expects that eMolecules Suppliers shall disclose information truthfully and accurately as they pertain to their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations if and when required by prevailing industry practices,

### **Respect Intellectual Property Rights**

eMolecules' Suppliers shall always respect Intellectual Property Rights. Any transfer of technology and know-how shall be carried out in a manner that protects Intellectual Property Rights.

### **Comply with fair business, advertising and competition laws**

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eMolecules Suppliers shall understand and comply with all applicable fair business, advertising and competition laws including fair trading and antitrust laws.

## **Ensure that there are safe ways to report abuses**

eMolecules Suppliers shall create an environment where employees are comfortable raising concerns. eMolecules Suppliers shall have adequate “whistle-blower” or reporting channels available and feedback processes in place designed to ensure confidentiality and protection for employees and suppliers.

## **Avoid conflicts of interest**

eMolecules Suppliers shall avoid conflicts between them and eMolecules by ensuring that they disclose any personal or outside business arrangements between their employees and themselves and any eMolecules employees or their families.

## **Confidentiality and Privacy**

Suppliers shall safeguard and make only proper use of confidential information to ensure that company and an individual’s privacy rights are protected. Suppliers shall comply with the applicable Data Privacy laws.

## **Intellectual Property**

Intellectual property rights shall be respected by suppliers; transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

## **Trade Compliance**

Suppliers shall comply with all applicable import and export controls, sanctions and other trade compliance laws of the United States and laws of applicable country(ies) where transaction(s) occur.

## **Animal Welfare**

(If applicable) Animals shall be treated humanely, with pain and stress minimized, and suppliers should comply with the IACUC (Institutional Animal Care Committee and Use Committee) guidelines. Animal testing should be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

## ***Labor Practices***

### **Child Labor**

Suppliers shall not employ under-aged labor as described in Minimum Age Convention 138 and Worst Forms of Child Labour Convention 182 of the International Labour Convention.

### **Forced Labor / Prison Labor / Trafficking In Persons**

- Suppliers shall not make use of forced or compulsory labor as described in Article 2 in the Forced Labor Convention 29 and Article 1 in the Abolition of Forced Labor Convention 105 of the International Labor Organization.
- Suppliers shall comply with all applicable labor laws, rules, and regulations, including but not limited to, all laws forbidding the solicitation, facilitation, or any other use of slavery, servitude, forced or compulsory labor or human trafficking, or sex trafficking, as those terms are used in the US laws, California Transparency in Supply Chains Act of 2010, California Civil Code, section 1714.43, the UK Modern Slavery Act 2015, and FAR 52.222-50, Combating Trafficking in Persons.
- Suppliers shall respect, within the framework of local laws and established practices, the principles of Article 2 in the Freedom of Association and Protection of the Right to Organize Convention 87 and Articles 1 and 2 in the Right to Organize and Collective Bargaining Convention 98 of the International Labor Organization.
- Suppliers shall not retain or withhold any of their worker's original identity documents or restrict access to such documents.
- Workers shall not be required to pay any monetary deposits for the purpose of obtaining employment.
- If any personal loans are offered to workers as part of their compensation or pursuant to company policy, the repayment terms should not be construed as debt bondage or forced labor.

### **Non- Discrimination and Equal Opportunity**

eMolecules is an equal opportunity employer. It is eMolecules' policy, and it expects its suppliers, to afford equal opportunity for employment and to not discriminate on the basis of actual, or perceived, race, color, religion, sex, gender, gender identity, pregnancy, childbirth or related medical condition, medical condition, physical disability, mental disability, genetic information, national or ethnic origin, ancestry, marital status, disabled veteran or veteran of Vietnam era status, age or any other characteristic protected by federal, state or local law with due regard to their relative qualifications and abilities.

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We are committed to diversity and inclusion, and we encourage our suppliers to do so as well.

eMolecules does not tolerate and prohibits discrimination, harassment or retaliation of or against job applicants, contractors, interns, volunteers or employees by another employee, supervisor, vendor, customer or any third party on the basis of race, color, creed, religion, age, sex or gender (including pregnancy, childbirth and related medical conditions), sexual orientation, gender identity or gender expression (including transgender status), national origin, ancestry, marital status, protected medical condition as defined by state law (cancer or genetic characteristics), physical or mental disability, military and veteran status, genetic information, or any other characteristic protected by applicable federal, state or local laws and ordinances. As we are committed to a workplace free of discrimination, harassment and retaliation, we require our suppliers to ensure fair treatment to all.

## **Fair Treatment**

Suppliers shall provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse and no threat of any such treatment.

## **Wages, Benefits and Working Hours**

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers shall communicate with the worker the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.

## **Freedom of Association**

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment.

## ***Health and Safety***

### **Worker Protection**

Suppliers shall protect workers from over exposure to chemical, biological and physical hazards, physically demanding tasks in the workplace and in any company-provided living quarters.

## **Process Safety**

Suppliers shall have programs in place to prevent or mitigate catastrophic or other unwanted releases of chemicals, biological agents or genetically modified organisms.

## **Emergency Preparedness and Response**

Suppliers shall identify and assess emergency situations in the workplace and any company- provided living quarters and minimize their impact by implementing emergency plans and response procedures.

## **Hazard Information**

Safety information relating to hazardous materials – including biological agents, genetically modified organisms, pharmaceutical compounds and pharmaceutical intermediate materials – shall be available to educate, train and protect workers from hazards.

## ***Environmental Responsibility***

### **Environmental Regulations Compliance**

Suppliers shall comply with all applicable environmental, health and safety laws, rules, and regulations. Suppliers shall have environmental, health and safety management systems that are based on ISO 14001 and ISO 45001. All required environmental permits, licenses, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

### **Environmentally Responsible Practices**

Suppliers shall operate in an environmentally responsible and efficient manner, and they shall minimize adverse impacts on the environment. Suppliers are urged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle.

### **Waste and Emissions**

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

### **Spills and Releases**

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Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment.

## **Greenhouse Gas Emissions Management**

Suppliers shall identify, manage, reduce, and responsibly control Greenhouse Gas (GHG) emissions from their operations and value chain. Suppliers shall regularly quantify their Scope 1, 2, and 3 emissions, set targets, monitor progress, and reduce their emissions.

## **Incident Reporting**

Suppliers shall report to eMolecules any Environmental violations, mishaps or accidents that occur, in a timely manner.

## ***Management Systems***

### **Monitoring and Compliance**

eMolecules suppliers may never engage in any activity prohibited by this Code of Conduct by knowingly employing – or failing to impose appropriate corrective action, up to and including termination, upon a subcontractor or supplier who performs the prohibited activity on behalf of eMolecules' supplier.

### **Commitment and Accountability**

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources thereto.

### **Documentation**

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

### **Sustainable Sourcing and Traceability**

Suppliers shall carry out due diligence on the source of materials to promote legal and sustainable sourcing.

eMolecules supports responsible sourcing practices, which includes compliance with the Conflict Minerals provision of the Dodd-Frank Act. As a result, suppliers shall design and implement reasonable processes to ensure all products supplied to eMolecules are "DRC Conflict Free" as defined under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Additionally, Supplier shall assist eMolecules with its conflict minerals compliance by making

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a reasonable, good-faith effort to answer any questions and to provide all materials requested by eMolecules regarding this initiative

## **Sub-suppliers**

Supplier should have a program to provide that their own suppliers meet expectations consistent with those set out in this document.

## **Fraud Prevention and Reporting**

Suppliers shall have robust processes to prevent fraud and report any incident to eMolecules, regardless of materiality.

## **Training and Competency**

Suppliers shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address these expectations.

## **Continuous Improvement**

With regards to areas covered under this Supplier code of Conduct, Suppliers are expected to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.